

Exhibit 10

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States, et al.,

Defendants.

Case No. 25-cv-11221

DECLARATION OF BRUCE K. CARLISLE

I, **Bruce K. Carlisle**, declare as follows:

1. I am the Managing Director of Offshore Wind at the Massachusetts Clean Energy Technology Center (“MassCEC”). I submit this declaration in support of Plaintiffs’ motion for summary judgment.

I. Personal Background

2. As Managing Director of Offshore Wind at MassCEC, I lead efforts to advance the successful and responsible development of the offshore wind industry in Massachusetts. These efforts include project planning, stakeholder engagement, and sector development. They also include research and innovation to reduce risk, increase market confidence, and realize the climate, economic, and workforce benefits of offshore wind and other ocean renewable energy.

3. My responsibilities as Managing Director of Offshore Wind also include the following: leading initiatives and investments in offshore wind port assessment and utilization; developing workforce training and education programs; helping grow the offshore wind supply

chain; directing technical and applied research projects and stakeholder engagement on marine wildlife, fisheries, weather and ocean data, and transmission studies; overseeing leasing, operations, and expansion of the New Bedford Marine Commerce Terminal—the nation’s first purpose-built facility specifically designed to support the construction, assembly, and deployment of offshore wind projects as well as other marine cargo and commodities; acting as principal for the redevelopment of the Salem Offshore Wind Terminal; serving as a designated lead on Intergovernmental Renewable Energy Task Forces for offshore wind planning, siting, leasing, and permitting with the U.S. Bureau of Ocean Energy Management; and representing Massachusetts in coordination and collaboration with offshore wind leads from other states along the Atlantic coast on topics relating to the offshore wind supply chain, workforce training and development, and energy procurement.

4. In my role at MassCEC, I represent Massachusetts in various groups and professional organizations, including the Oceanic Network’s State Advisory Group, New England Partner Association for Offshore Wind Supply Chain, the Massachusetts Interagency Council on Offshore Wind, the Special Initiative for Offshore Wind, and the Connecticut Wind Collaborative.

5. I have held the position of Managing Director of Offshore Wind at MassCEC for over six years.

6. Prior to this role, I served in various leadership roles, including Director and Assistant Director, at the Massachusetts Office of Coastal Zone Management, which is the lead agency for ocean and coastal policy in Massachusetts.

7. Since graduating with a bachelor’s degree and a master’s degree in Environmental Policy from Tufts University, I have amassed over 25 years of professional working experience in

coastal and ocean policy and management, with over 15 of those years focused on the offshore wind industry specifically.

8. I make this declaration as a representative of MassCEC, in part based on the business records of MassCEC, and in part based on my personal knowledge of and experience with offshore wind matters.

9. The purpose of this declaration is to provide information regarding the investments Massachusetts has made in support of its offshore wind industry and its continued reliance on federal action to ensure the full social, environmental, and economic benefits of the industry and Massachusetts's investments.

II. MassCEC

10. MassCEC is a state economic development authority dedicated to accelerating the growth of the clean energy sector across Massachusetts to spur job creation, deliver statewide environmental benefits, and secure long-term economic growth for the people of Massachusetts. It was established by Chapter 23J of the Massachusetts General Laws and began operating in 2009.

11. MassCEC's programs focus on offshore wind, clean energy workforce development (including the offshore wind workforce), building decarbonization, clean transportation, electrical grid modernization, and funding and investing in climatetech companies from research through commercialization. MassCEC makes funding awards through competitive Request for Proposals and grant solicitation processes. It evaluates all applications for funding based on the project's alignments with the stated program goals.

12. MassCEC is funded primarily by the Massachusetts Renewable Energy Trust Fund ("RET"), which was authorized by the Massachusetts legislature in 1997 as part of the electric utility restructuring process. The RET is funded by a systems benefit charge of 2.5 mills per

kilowatt-hour—or approximately 30 cents per month for the average residential customer—paid by ratepayers of electric utilities in Massachusetts, as well as nine municipal electric departments that have elected to join the RET.

13. In addition to the systems benefit charge, MassCEC also receives funding from the state budget (\$20 million in FY25) and from partner state agencies like the Department of Energy Resources. Over time, MassCEC has also received a smaller portion of its funding from federal resources, including the American Rescue Plan Act of 2021 (“ARPA”), Department of Energy, the Bureau of Ocean Energy Management, and the Environmental Protection Agency.

14. In 2022, the Massachusetts legislature also created the Offshore Wind Industry Investment Trust Fund (“OSW Trust”), which is administered by MassCEC and exclusively focuses on supporting the offshore wind sector. It was initially funded by a one-time appropriation of ARPA funds; however, it has also been funded with state funds including \$15,000,000 in budget appropriations in FY 2024.

15. In a demonstration of future commitment to the offshore wind industry, in 2024, the Massachusetts legislature allocated up to \$200,000,000 in bond funding to the OSW Trust to support the offshore wind industry.

16. MassCEC is governed by a fifteen-member Board of Directors, seven of whom are ex officio roles from government and public institutions, and eight of whom are appointed by the Governor from selected industry, education, and energy sectors. The Secretary of Energy and Environmental Affairs serves as the chair of MassCEC’s Board.

III. Massachusetts Has Made Significant Investments in the Offshore Wind Industry

17. Massachusetts, through MassCEC, has made significant investments in the offshore wind industry. These investments (including commitments for future spending), totaling more than \$330,000,000 since 2011, have strategically targeted key funding gaps and areas of need in the offshore wind industry, including port infrastructure like the New Bedford Marine Commerce Terminal; workforce development; supply chain development; and applied science, research, and analysis to address industry-identified challenges.

A. Port Infrastructure

18. MassCEC manages investments for the development of important offshore wind port infrastructure. In doing so, MassCEC ensures the utility of certain Massachusetts ports for offshore wind deployment and associated activities. These associated activities, which MassCEC also helps coordinate, include trainings (e.g., for marine harbor pilots); coordination with port managers and users; and support for real-time monitoring of weather and ocean conditions.

19. Since 2011, MassCEC has directed over \$347,600,000 in port related infrastructure. These directed funds include expenditures for the assessment, planning, construction, and redevelopment of critical maritime infrastructure across the Commonwealth's coast as well as commitments to fund future improvements and expansion at the New Bedford Marine Commerce Terminal and the Wind Technology Testing Center in Charlestown, MA ("WTTC").

20. One of these key port investments is the New Bedford Marine Commerce Terminal, which MassCEC owns and operates in the Port of New Bedford. This terminal is specifically designed to support the construction, assembly, and deployment of offshore wind projects, as well as handle bulk, break-bulk, container shipping and large specialty marine cargo.

- a. Since 2011, Massachusetts has invested more than \$140,000,000 in the design, engineering, construction, and commissioning of the New Bedford Marine Commerce Terminal. With its unique design and engineering, this facility is capable of handling the massive components of offshore wind farms, including turbine towers, blades, nacelles, and foundations. This facility is the first of its kind in the U.S., and over the past several years, other states and private entities have recognized the need for this critical infrastructure and have also invested in the development of heavy-lift port infrastructure critical to the large-scale construction of offshore wind on the Atlantic Coast (which are necessary to meet state renewable energy goals), including over \$3,000,000 in property expansion and more than \$6,600,000 in redevelopment costs.
 - b. In the summer of 2024, MassCEC announced a capital infrastructure project to improve the New Bedford Marine Commerce Terminal and increase the ability to support the needs of offshore wind developers. The project will expand the size of the terminal by 24%, increase the length of heavy load bearing quayside, and provide additional office and warehouse space. This project will maintain and increase Massachusetts's ability to provide infrastructure that will support the anticipated increased demand for port facilities to deploy offshore wind projects. The total estimated cost of this investment is \$74,000,000. MassCEC has committed \$53,000,000 to this project.
21. As announced in late 2022 through the Massachusetts Offshore Wind Ports Investment Challenge program, MassCEC has awarded \$135,000,000 in funding for port

infrastructure projects related to offshore wind. This state funding is anticipated to facilitate over \$444,000,000 in new private capital expenditure.

22. The \$135,000,000 in funds awarded by Mass CEC included the following specific investments:

- a. \$75,000,000 to Crowley Wind Services, Inc. and Salem, Massachusetts, for the conversion of a former coal-fired power plant into an offshore wind marshalling port.
- b. \$25,000,000 to Prysmian Projects North America for the redevelopment of part of the Brayton Point Marine Commerce Center in Somerset, Massachusetts, which was set to construct a manufacturing facility and terminal for marine high-voltage cables. Prysmian cancelled its plans to construct the facility on January 17, 2025. Since March 2025, Massachusetts and the owners of the site have been working with another Tier 1 manufacturer who has expressed strong interest in establishing offshore wind related factory and indicates that the site is a finalist in its selection and due diligence process.
- c. \$15,000,000 to the New Bedford Port Authority in New Bedford, Massachusetts, for the improvement of its North Terminal 1 port and to help modernize port-wide operations to efficiently manage increased vessel traffic.
- d. \$15,000,000 to the New Bedford Foss Marine Terminal in New Bedford, Massachusetts, for the redevelopment of a former power plant into an offshore wind port capable of supporting offshore wind construction and operation activities.
- e. \$4,639,200 to Shoreline Marine Terminals in New Bedford, Massachusetts, for construction of new bulkhead, docking space, lift piers, fueling capacity, and other

infrastructure, which will support the day-to-day operations of offshore-wind-crew transfer and vessel maintenance and repairs.

- f. \$360,800 to Gladding Hearn Shipbuilding for an upgrade to its Somerset, Massachusetts, facility, which will enable it to fabricate and repair aluminum high-speed crew-transfer vessels.

23. MassCEC is also engaged in a project to expand the WTTC. The WTTC is the only facility in the U.S. currently capable of performing endurance and certification testing of full-scale offshore wind turbine blades. MassCEC is expanding the WTTC in order to accommodate the testing of increasingly large prototypes in excess of 100 meters in length. MassCEC has committed to expend up to \$10,000,000 to develop a full design and has engaged the Massachusetts Port Authority to act as the project and construction manager and an external design firm to complete the design work by the end of 2026.

B. Workforce

24. MassCEC works to develop and sustain a qualified, well-trained, safe, and diverse offshore wind workforce through grants and technical assistance for programs focused on health/safety and technical training certifications, industry and trades partnerships, undergraduate and graduate programs, and improving access to opportunities. MassCEC also convenes and facilitates offshore wind workforce development practitioners to exchange information and best practices through the Offshore Wind Workforce Community of Practice.

25. Since 2018, MassCEC has offered the Offshore Wind Works grant program, which seeks to increase the Commonwealth's capacity to develop a Massachusetts workforce capable of contributing to the planning, deployment, and operations and maintenance of offshore wind farms in southern New England, as well as to support the manufacturing of offshore wind components

and otherwise maintain the offshore wind supply chain. This program has provided over \$18,000,000 dollars to 30 different organizations since its inception. The 2024 Offshore Wind Works program will provide up to an additional \$2,500,000 in funding.

C. Supply Chain

26. MassCEC also supports the development of a local and robust offshore wind supply chain by: (1) facilitating a supply chain directory that allows local businesses to post information regarding services they can provide to the industry; (2) hosting events where developers can meet potential suppliers and service providers; and (3) completing a supply chain assessment that articulates offshore wind supply chain requirements and the ability of local businesses to fill those needs. MassCEC investment in this work totals over \$5,600,000. MassCEC, in consultation with the Massachusetts Department of Revenue, has also established an offshore wind business tax incentive program for companies engaged in offshore wind development, manufacturing, or commercialization totaling up to \$35,000,000 in tax credits over a five-year period beginning in 2024.

D. Science, Research, and Analysis

27. MassCEC cultivates capacity and provides direct support for science, applied research, and analysis to advance responsible offshore wind development, reduce costs, increase reliability, and evaluate and mitigate fisheries, wildlife, supply chain, logistics, and transmission issues. Since 2011, MassCEC has invested over \$16,900,000 of state funds in this program area, plus an additional \$3,900,000 in federal funds.

28. Among other things, these funds provided for the advancement of aerial marine wildlife surveys to better understand the spatial and temporal patterns of wildlife found within and around current and projected areas of offshore wind development. MassCEC, offshore wind

developers, and the Bureau of Ocean Energy Management have invested in these valuable surveys which inform the siting, construction, and operation of offshore wind facilities.

29. MassCEC's investments in science, research, and analysis include \$2,200,000 that enabled collaborations with other states and the United Kingdom, through the National Offshore Wind Research and Development Consortium, to address key areas of research need, such as floating offshore wind.

30. In early 2025, MassCEC awarded funds to eight organizations totaling \$3,200,000 to address a broad range of offshore wind related topics including potential effects on songbird migration routes; marine mammal density and detection analysis; offshore wind interactions with commercial fishing activities; and wireless sensor technology development for offshore wind blades.

31. These significant and strategic investments that support many aspects of the offshore wind industry represent MassCEC's commitment to ensure that the Commonwealth is able to deploy gigawatts of renewable offshore wind energy for years to come.

**IV. President Trump’s Wind Memorandum Threatens to Turn Massachusetts’s
Offshore Wind Investments into Sunk Costs and Severely Limit
The Expected Benefits Flowing from Those Investments**

32. I am familiar with the Presidential Memorandum titled “Temporary Withdrawal of All Areas of the Outer Continental Shelf from Offshore Wind Leasing and Review of the Federal Government’s Leasing and Permitting Practices for Wind Projects” signed on January 20, 2025, by President Trump (“Wind Memo”), and particularly the sections with relevance to the offshore wind industry in Massachusetts.

33. Section 1 of the Wind Memo withdraws from disposition all areas within the Outer Continental Shelf (“OCS”) as defined in the Outer Continental Shelf Lands Act, 43 U.S.C. §§ 1331 et seq., but does not propose to alter the rights associated with existing leases in the withdrawn areas.

34. Section 2 of the Wind Memo forbids anyone in the federal government from issuing “new or renewed approvals, rights of way, permits, leases, or loans for onshore or offshore wind projects”—at least until “the completion of a comprehensive assessment and review of Federal wind leasing and permitting practices” conducted by the Secretary of the U.S. Department of the Interior.

35. The Wind Memo’s moratorium on offshore wind development threatens to turn the hundreds of millions of dollars Massachusetts has invested in the offshore wind industry into sunk costs. An indefinite pause in offshore wind development will delay and potentially eliminate the benefits expected to flow to Massachusetts and its residents from these investments—some of which are described below.

36. In order to meet the Commonwealth’s carbon emission reduction goals and achieve net zero emissions by 2050, as set forth in the Commonwealth’s Clean Energy and Climate Plan

and as required by the Act Driving Clean Energy and Offshore Wind (2022), offshore wind will need to be a key component of the state's renewable energy portfolio.

37. Massachusetts has selected three offshore wind projects through competitive procurements to provide offshore wind energy to Massachusetts residents. These offshore wind projects will create thousands of jobs across a national supply chain and generate billions in new investments, producing economic, environmental, and social benefits to the state, region, and nation.

38. It is anticipated that the three selected Massachusetts projects—Vineyard Wind 1¹, SouthCoast Wind², and New England Wind 1³—together will create more than 10,000 jobs in Massachusetts and Rhode Island.

39. On its own, the Vineyard Wind 1 project currently under construction has supported about 2,000 jobs⁴ and generated more than 200 supply chain contracts across 29 states, yielding about \$2 billion in new investments in the United States.⁵

40. Additionally, construction related to the improvement and expansion of critical port infrastructure to meet the offshore wind industry's needs will create local jobs. For example, the construction of the Salem Offshore Wind Terminal is expected to generate more than 800 jobs (full time employee job years).⁶

¹ Vineyard Wind, America's First Large-Scale Offshore Wind Farm, Delivers Full Power from 5 Turbines to the New England Grid. (2025, May 1). Mass.gov Press Release. <https://www.mass.gov/news/vineyard-wind-americas-first-large-scale-offshore-wind-farm-delivers-full-power-from-5-turbines-to-the-new-england-grid>.

² Massachusetts and Rhode Island Announce Largest Offshore Wind Selection in New England History. (2025, May 1). Mass.gov Press Release. <https://www.mass.gov/news/massachusetts-and-rhode-island-announce-largest-offshore-wind-selection-in-new-england-history>.

³ Avangrid's New England Wind 1 Project Selected by Massachusetts in Offshore Wind Solicitation. (2025, May 1). Press Releases. <https://www.avangrid.com/w/avangrid-s-new-england-wind-1-project-selected-by-massachusetts-in-offshore-wind-solicitation>.

⁴ *Vineyard Wind 1 Impact on Jobs and Economic Output Annual Report* (Vineyard Wind 1, Nov. 3, 2024)

⁵ Oceanic Network. Internal records. (2025, April 23).

⁶ Crowley Wind Services Salem Offshore Wind Terminal. (2025, May 1). Salem Offshore Wind Terminal. <https://www.crowley.com/wind/salem/>.

41. Offshore wind projects in Massachusetts have also generated more than 400 supply chain contracts across more than 30 states including shipbuilding in Louisiana, Florida, and Texas, cable manufacturing in North Carolina, and geotechnical survey services from Virginia.⁷

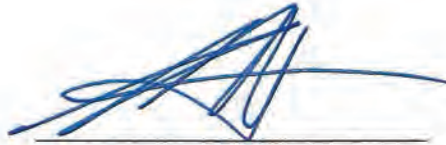
42. The Wind Memo threatens these benefits—not only helping achieve Massachusetts’s climate goals but also to its economy and livelihoods of its citizens. A major setback to the offshore wind industry would spoil years of careful work and strand the substantial resources the Commonwealth through MassCEC have invested to develop the industry in Massachusetts.

⁷ Oceanic Network. *Offshore Energy at Work*. (2025, May 1). <https://oceanic.org/offshore-energy-at-work/>.

Privileged/Confidential/Attorney Work Product/Common Interest

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Sudbury, Massachusetts on July 28, 2025.



Bruce K. Carlisle
Managing Director of Offshore Wind
Massachusetts Clean Energy Center